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6 Attorneys for Defendant  
JASON EDWARD THOMAS CARDIFF

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA.

Plaintiff.

vs.

# JASON EDWARD THOMAS CARDIFF,

Defendant.

Case No. 5:23-cr-00021-JGB

**DECLARATION OF STEPHEN G.  
LARSON IN SUPPORT OF JASON  
CARDIFF'S *EX PARTE*  
APPLICATION FOR PERMISSION  
TO TRAVEL TO KANSAS CITY**

*[Filed concurrently with Ex Parte Application and [Proposed] Order]*

## DECLARATION OF STEPHEN G. LARSON

I, Stephen G. Larson, declare as follows:

1. I am a partner with Larson LLP, and I represent Jason Cardiff in this matter. I make this declaration in support of Jason Cardiff's *Ex Parte* Application for Permission to Travel to Kansas City.

6       2. Mr. Cardiff has been released on a \$530,000 appearance bond, justified  
7 in the amount of \$500,000 with full deeding of real property. His release conditions  
8 include, among other conditions: a travel restriction to the Central District of  
9 California and the Southern District of Texas; a curfew between the hours of 8:00  
10 p.m. and 8:00 a.m.; participation in the Location Monitoring Program with location  
11 monitoring technology at the discretion of the Supervising Agency; and placement  
12 in the custody of third-party custodian, Attorney Stephen Cochell. Lilia Murphy  
13 and Brian Kennedy executed affidavits of sureties in support of the bond. Ms.  
14 Murphy also deeded her home as collateral. The December 6, 2023 Release Order  
15 and Bond Form is attached as **Exhibit A**.

16       3.     Mr. Cardiff is currently living with Attorney Cochell in Kingwood,  
17 Texas, and he is being supervised by United States Probation Officer Jack Sherrod  
18 of the Southern District of Texas.

19       4. Jason Cardiff serves as the CEO and President of Redwood Scientific  
20 Technologies, Inc. (“Redwood”). He is seeking permission to travel to Kansas City  
21 without his third-party custodian, Attorney Cochell, on December 30, 2023 with a  
22 return to Texas on January 1, 2024. The purpose of this requested travel is to  
23 engage in two days of meetings and engagements with Redwood shareholders and  
24 directors. Surety Brian Kennedy will be in attendance at these meetings and  
25 engagements as well.

26       5.     On December 19, 2023 and December 20, 2023, my law partner, Hilary  
27 Potashner, spoke with United States Probation Officer Jack Sherrod, the federal  
28 officer supervising Mr. Cardiff. With the understanding that Attorney Cochell

1 would not be traveling with Mr. Cardiff, Officer Sherrod advised that United States  
2 Probation does not oppose this request. Officer Sherrod did, however, request that  
3 the curfew be lifted for the nights that Mr. Cardiff would be at a hotel in Kansas  
4 City, explaining that it is logistically difficult to enforce a curfew in a hotel.

5       6. Should Mr. Cardiff be permitted to travel to Kansas City, he will  
6 nonetheless remain subject to the bond condition that he participate in the Location  
7 Monitoring Program.

8       7. Hilary Potashner also personally spoke by telephone on December 20  
9 with Sureties Lilia Murphy and Brian Kennedy. Both Ms. Murphy and Mr.  
10 Kennedy indicated that they do not oppose Mr. Cardiff's request.

11       8. On December 20, 2023, AUSA Valerie Makarewicz advised that the  
12 government opposes Mr. Cardiff's request to travel to Kansas City.

13       I declare under penalty of perjury under the laws of the United States of  
14 America that the foregoing is true and correct to the best of my knowledge.

15       Executed on this 20th day of December, 2023, at Los Angeles, California.

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/s/ Stephen G. Larson  
Stephen G. Larson

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